William D. Edwards

Partner

DIRECT 216.583.7150
DIRECT FAX 216.583.7151

EMAIL wdedwards@ulmer.com

August 19, 2021

VIA ELECTRONIC FILING

The Honorable Scott Harris Clerk, Supreme Court of the United States One First Street, N.E. Washington, D.C. 20543

Re: No. 21-135, Melanie Pelcha, Petitioner v. Watch Hill Bank

Unopposed Motion to Extend Time to Respond to Petition for Writ of Certiorari

Dear Mr. Harris:

The undersigned represents Respondent Watch Hill Bank ("Respondent") in the above-referenced case. Petitioner Melanie Pelcha ("Petitioner") filed a Petition for Writ of Certiorari ("Petition") on July 28, 2021. The Petition was docketed on August 2, 2021. Respondent's deadline to file a response to the Petition is September 1, 2021.

Pursuant to Supreme Court Rules 15.3 and 30.4, Respondent respectfully moves for a 30-day extension of time, up to and including October 1, 2021, within which to respond to the Petition. The extension of time is necessary due to the press of business and other matters, including undersigned counsel's prior commitments in earlier-filed cases, unrelated litigation deadlines, and necessary preparation for an upcoming jury trial.

Petitioner does not oppose this request for an extension of time to respond to the Petition. This is the first such request for an extension made by Respondent. This request is being made in good faith and is not interposed for the purpose of delay. No undue prejudice or delay will result from the granting of this unopposed motion.

For the foregoing reasons, Respondent respectfully requests that the deadline for responding to the Petition be extended from September 1, 2021 to October 1, 2021.

FIRM 216.583.7000

FAX 216 583 7001

Sincerely yours,

CLEVELAND

COLUMBUS

CINCINNATI

CHICAGO

NEW YORK

WASHINGTON DC

BOCA RATON

ULMER.COM

William D. Edwards

Cc: See attached Certificate of Service

5 Culy

No. 21-135

IN THE SUPREME COURT OF THE UNITED STATES

MELANIE PELCHA,
Petitioner,
v.
WATCH HILL BANK,
Respondent.

Certificate of Service

I hereby certify that on August 19, 2021, I caused the foregoing *UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PETITION FOR WRIT OF CERTIORARI* to be served upon all individuals required to be served in this proceeding, at the addresses listed below. Service was made via electronic mail and first-class mail.

Service List:

Donald B. Hordes
RITTER & RANDOLPH
One East Fourth Street
Cincinnati, OH 45202
(513) 381-5700
dhordes@ritter-randolph.com
Counsel for Petitioner Melanie Pelcha

/s/ William D. Edwards

Attorney for Respondent Watch Hill Bank